

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

Plaintiff

v.

CHANBOND, LLC,

Defendant.

C.A. No. 1:21-cv-01456-MN

**AMENDED STIPULATION CONCERNING TEMPORARY RESTRAINING
ORDER AND INTEREST**

WHEREAS, Plaintiff CBV, Inc. (“CBV”) and Defendant ChanBond, LLC (“ChanBond”) are parties to this action (collectively, the “Parties”); and

WHEREAS, non-parties Deirdre Leane and IPNAV, LLC (collectively, “Proposed Intervenor”) intend to intervene as Defendants in this action; and

WHEREAS, CBV has filed a motion for a preliminary injunction restraining ChanBond from distributing the proceeds of ChanBond’s patent litigations referenced in CBV’s Amended Complaint (the “Complaint”) to the Proposed Intervenor (the “PI Motion”); and

WHEREAS, CBV has sought a TRO in connection with that motion; and

WHEREAS, the Parties and Proposed Intervenor have been able to reach an agreement that moots the need for a TRO or briefing relating to that application;

NOW, THEREFORE, the Parties and Proposed Intervenor hereby stipulate and agree as follows:

1. ChanBond and its agents will voluntarily refrain from distributing the Settlement Funds to Proposed Intervenor until CBV’s Motion for Preliminary Injunction is heard and a decision rendered by the Court;

2. Proposed Intervenors shall not seek to recover post-judgment interest on the arbitration award in *Leane et al. v. Unified Online, Inc. et al.*, Case No. 01-20-0015-0793 (AAA) for the period between execution of this stipulation and the preliminary injunction hearing if and only if: (1) ChanBond pays Proposed Intervenors any amounts due on the award (or such lesser sum as it is directed to pay over) within five (5) business days of a decision by the Court denying the relief requested in the PI Motion or by subsequent order of the Court lifting any restraint or otherwise directing the payment of any sums to Proposed Intervenors; **and** (2) the Court grants the preliminary injunction without requiring CBV to post a bond to cover the post-judgment interest generated by such relief.

3. In the event the Court grants the relief sought in the PI Motion and requires CBV to post a bond in connection therewith, such Court-ordered bond shall be retroactive to the date of this Stipulation.

4. CBV shall contemporaneously herewith withdraw its application for temporary restraining order, without prejudice and with reservation of all rights with respect thereto.

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**BUCHANAN INGERSOLL
& ROONEY PC**

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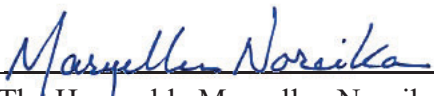
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*Attorneys for Deirdre Leane and IPNAV,
LLC*

Dated March 17, 2022.

IT IS SO ORDERED this 18th day of March 2022.



The Honorable Maryellen Noreika
United States District Judge